

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

TAMARA GREEN, et al.	:
	:
Plaintiffs,	:
	:
v.	: Case No. 15-MC-144-JP
	:
WILLIAM H. COSBY, JR.	:
	:
Defendant.	:

**PLAINTIFFS' MOTION TO SANCTION DEFENSE COUNSEL FOR FILING
DEFENDANT'S MOTION FOR LEAVE TO TAKE DISCOVERY REGARDING A
POTENTIAL VIOLATION OF THIS COURT'S ORDER**

COME NOW the Plaintiffs, by and through their counsel, and hereby move to sanction defense counsel for filing Defendant's Motion for Leave to Take Discovery Regarding a Potential Violation of this Court's Order ("Motion for Leave"). The Motion for Leave is frivolous, has been filed in bad faith, and is an attempt to vexatiously multiply the proceedings. Accordingly, Plaintiffs request that the Court compel defense counsel to pay Plaintiffs' attorney's fees incurred in litigating the Motion for Leave, and the instant Motion to Sanction, and that the Court impose any further sanctions that it deems appropriate, pursuant to 28 U.S.C. § 1927, Local Rule of Civil Procedure 83.6.1, and/or this Court's inherent authority.¹

¹ It is presently premature to calculate the attorney's fees incurred by Plaintiffs, at least because it is likely that Plaintiffs will file a Reply in support of the Motion to Sanction (assuming the Court grants leave to do so). If and when the Court ultimately denies Defendant Cosby's Motion for

In support of this Motion to Sanction, Plaintiffs hereby adopt and incorporate their Opposition to the Motion for Leave (including the supporting Memorandum), and furthermore attach hereto a Memorandum.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiffs' Motion to Sanction Defense Counsel for Filing Defendant's Motion for Leave to Take Discovery Regarding a Potential Violation of this Court's Order.

Respectfully submitted,

/s/ Joseph Cammarata
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SIEGEL, P.C.**

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Leave and grants Plaintiffs' Motion to Sanction, Plaintiffs propose to submit a calculation of attorney's fees incurred, within five days of the date of the Court's Order.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of August, 2015, a copy of Plaintiffs' Motion to Sanction Defense Counsel for Filing Defendant's Motion for Leave to Take Discovery Regarding a Potential Violation of this Court's Order, with supporting Memorandum and proposed Order, were served by Case Management / Electronic Case Files upon:

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